

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 24-11526
Ewa Filipkowski) Chapter 13
) Judge: Janet S. Baer
Debtor)

Ewa Filipkowski LOZA LAW
21W513 Park Av 2340 S RIVER RD #120
Lombard, IL 60148 DES PLAINES, IL 60018

NOTICE OF MOTION

Please take notice that on November 08, 2024 at 10:00 am, a representative of this office shall appear before the Honorable Judge Janet S. Baer, or any judge sitting in that judge's place, either in Courtroom 615 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 731 2971** and the passcode is **587656**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Pamela L. Peterson
FOR: Glenn Stearns, Chapter 13 Trustee

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CERTIFICATE OF SERVICE

I, Jenn Karmia,

an attorney, certify

or

a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown below at the address shown and by the method indicated on October 31, 2024 at 5:00p.m. .

LOZA LAW
2340 S RIVER RD #120
DES PLAINES, IL 60018

via CM/ECF

Ewa Filipkowski
21W513 Park Av
Lombard, IL 60148

U.S. mail

801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Jenn Karmia

FOR: Glenn Stearns, Chapter 13 Trustee

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Wednesday, August 7, 2024.
2. The Debtor has failed to:
 - a. File amended schedule(s) I.
 - b. Resolve IRS and IDOR proof of claims.
 - c. Document how sale proceeds were spent from both properties.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Pamela L. Peterson
FOR: Glenn Stearns, Chapter 13 Trustee